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June 23, 2010

VIA EMAIL

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Director, Remediation
Site Remediation Section
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155
Attn: Nile Fellows

**Subject United States of America, et al. vs. Reilly Tar and Chemical Corporation,
et al., File No. Civ. 4-80-469; CD-RAP Section 7.4 Prairie du Chien – Jordan
Aquifer Gradient Control Assessment**

Gentlemen,

The City of St. Louis Park (City) met with the Minnesota Pollution Control Agency and the U.S. Environmental Protection Agency (the Agencies) on June 9, 2010 (USEPA via phone and web meeting) to discuss the status of the project to assess gradient control in the Prairie du Chien – Jordan Aquifer. After the City described the status of data collection activities and provided examples of the output of the data assessment software being used, the Agencies requested an updated schedule for the work.

The attached schedule responds to the Agencies' request. Task 1 is complete for the purposes of this project, with the caveat that additional water level data can help refine the groundwater flow representations. Task 2 is complete in the sense that six months worth of data exist, but is incomplete because the data are not currently available. Critical data for wells in Edina will be available within the next 60 to 90 days according to Edina personnel. Therefore, at the point in time when the Edina data are available, we will have data covering the low municipal production season in winter through the heavy summer demand period in 2010. The City proposes another working meeting to review the expanded data set on or about September 15.

The City will provide a report that assesses the performance of the Prairie du Chien – Jordan gradient control system 60 days after the Edina data are incorporated into our database. This report is expected to be submitted on or before mid November 2010. Since the data collection will be ongoing, the City recommends updating the results of this activity in the Annual Monitoring Report due March 15 each year.

Tasks 3 through 6 on the attached table were conceived to be a collaborative modeling effort between the City and the Agencies. However, the limitations/uncertainties of the models provide little confidence that adding gradient control wells will be guaranteed to eliminate the need for water treatment at downgradient drinking water wells. The City views continued modeling as an indirect, secondary basis for making project decisions and recommends that the water quality data be used to make project decisions. The City believes that the best management practice to deal with PAH that exceed established drinking water criteria in Edina is to provide treatment at the affected well.

The City looks forward to continuing our discussion with you on this topic. Please contact me if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, reading "William M. Gregg". The signature is written in a cursive, flowing style.

William M. Gregg
Project Leader
City of St. Louis Park

cc. Mike Rardin, City of St. Louis Park Public Works Director
Scott Anderson, City of St. Louis Park Utilities Superintendent

Table 1 Revised Prairie du Chien - Jordan Aquifer Gradient Control Plan Schedule

October 2008 Schedule					June 2010 Task and Schedule Update
Task	Task Description	Schedule	Task Lead	Projected Dates	
1	Equip PCJ wells with transducers	Within two months of Plan approval	City	23-Nov-08	Task is complete, however, if additional wells can be instrumented (i.e., Minnetonka well 14), then improved assessment would result.
2	Collect continuous water level data (Opportunities for PCJ aquifer tests)	For a duration of six months after Task 1	City	23-Nov-08 to 23-May-09	The Edina data are being collected but are not currently accessible. Within 60 to 90 days we should have access to the St. Louis Park, Edina, and Hopkins data covering the period from low winter production to high summer production.
3	Utilize water level data to determine aquifer parameters, new model input, and PCJ impacts on shallower aquifers	One to two months after Task 2	City and Agencies	23-Jul-09	This task may be academic if modeling is not needed to predict groundwater flow changes due to new pumping stresses.
4	Conduct additional modeling runs and report	Two to four months after Task 2	City and Agencies	23-Sep-09	Conduct another update/working meeting to review Edina data in September 2010. Submit PCJ gradient control assessment report in November 2010.
5	Assess modeling results and prepare recommendations for changing PCJ gradient control system, if needed	Within two months of the final modeling results	City	23-Jan-10	The City recommends that project decisions be based on actual water quality data instead of model results .
6	If modeling indicates that gradient control is not effective, design and install additional monitoring wells	Within two months of deciding to install wells (and Agencies' approval)	City	Spring 2010	The City recommends utilizing the current monitoring network with no new wells.
7	If groundwater monitoring indicates a potential PAH problem in Edina, institute groundwater pumping at SLP6	Within one month. Other pumping scenarios could be considered, but SLP6 can be started up the quickest	City	Within one month of the receipt of the data	The City recommends providing GAC treatment to any Edina municipal wells that require drinking water treatment.